

Exhibit 61

(REDACTED)

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

WILHEN HILL BARRIENTOS,)
ET AL.,)
)
Plaintiffs,)
) CIVIL ACTION FILE
vs.)
) NO: 4:18-CV-00070-CDL
CORECIVIC, INC.,)
)
Defendant.)

DEPOSITION OF CALVIN BLUE

ATLANTA, GEORGIA

WEDNESDAY, NOVEMBER 10, 2021

(Reported Remotely)

REPORTED BY: TANYA L. VERHOVEN-PAGE,
CCR-B-1790

JOB NO. 201430

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November 10, 2021

9:17 a.m.

Deposition of

CALVIN BLUE, held in Atlanta,
Georgia before Tanya L. Verhoven-Page,
Certified Court Reporter and Notary Public
of the State of Georgia.

APPEARANCES OF COUNSEL

On behalf of the Plaintiffs:

SOUTHERN POVERTY LAW CENTER
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Montgomery, Alabama 36104
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BY: MEREDITH STEWART, ESQ.
BY: REBECCA CASSLER, ESQ.
(Via Zoom)

PERKINS COIE LLP
2901 N. Central Avenue
Phoenix, Arizona 85012
BY: MIKAELA COLBY, ESQ.
(Via Zoom)

On behalf of the Defendant:

STRUCK LOVE BOJANOWSKI & ACEDO, PLC
3100 West Ray Road
Chandler, Arizona 85226
BY: JACOB LEE, ESQ.
(Via Zoom)

- - -

1 C. BLUE

2 Q Is that an ICE detention facility?

3 A Yes, ma'am.

4 Q How long have you been there?

5 A Since February of this year.

6 Q Where were you employed previously?

7 A Houston Processing Center.

8 Q How long were you employed there?

9 A 2016 to February of this year.

10 Q And where were you employed previous to
11 that?

12 A Stewart Detention.

13 Q How long were you at Stewart?

14 A From 2013 to 2016.

15 Q Okay. How long have you been employed by
16 CoreCivic?

17 A From -- 24 and some months. Twenty-four
18 years and some months.

19 Q Okay. And during those 24 years and some
20 months, how many facilities have you worked at that
21 are ICE detention facilities?

22 A Five.

23 Q Can you tell me what those five are and
24 what time periods those were?

25 A I started at Houston Processing Center in

1 C. BLUE

2 performance of the detention facility as a whole?

3 MR. LEE: Foundation.

4 THE WITNESS: That is --

5 MS. OSORNO: You can answer.

6 THE WITNESS: Could you restate
7 that?

8 BY MS. OSORNO:

9 Q Sure. Do you know if your bonus is also
10 tied to the performance of the facility as a whole?

11 A I don't know that right offhand.

12 Q Do you know if your bonus was tied to
13 Stewart's profits?

14 A I do not know about that right there.

15 Q Okay. Mr. Blue, AW is a common
16 abbreviation for assistant warden, right?

17 A Yes.

18 Q Okay. And let's go back to your time at
19 Stewart. What were your job titles at Stewart?

20 A Assistant warden.

21 Q Were you the only assistant warden?

22 A No, they had one other.

23 Q Okay. How are those positions different?

24 A One was over programs and one was over
25 operation.

1 C. BLUE

2 Q Okay. And which were you?

3 A Over operation.

4 Q What were your duties and
5 responsibilities as AW of operations?

6 A To ensure the safety and security of the
7 facility.

8 Q Okay. And day-to-day, what does that
9 look like?

10 A Making rounds, talking to the detainees
11 ensuring we're following the PBNDS standards that is
12 governed by ICE.

13 Q Okay. So you made rounds daily and you
14 ensured that you were following the PBNDS?

15 A Yes, ma'am.

16 Q And when we refer to the PBNDS, we're
17 referring to the Performance-Based National Detention
18 Standards?

19 A Yes.

20 Q And those are ICE standards?

21 A Yes.

22 Q Okay. Let me go back to the bonuses
23 really quickly.

24 You said that the bonus was tied to your
25 performance. How do you know that?

C. BLUE

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C. BLUE

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22 BY MS. OSORNO:

23 Q Mr. Blue, as AW, were you responsible for

24 ensuring the kitchen had sufficient CoreCivic

25 officers?

1 C. BLUE

2 What is an example of a refusal to obey?

3 A You could tell him that he needs to go
4 and sit down and he refuses saying he's not going to
5 do what you tell him to do.

6 Q Could staff be both CoreCivic and Trinity
7 staff?

8 A What do you mean?

9 Q The code violation is refusing to obey a
10 staff member or officer's order, and I'm asking if
11 staff member can refer to CoreCivic and Trinity
12 staff.

13 A A staff member is a staff member. It
14 could be Trinity or CoreCivic.

15 Q Okay. And if we look on the side, this
16 also has a list of possible sanctions for the 300
17 offenses, and this also includes disciplinary
18 segregation, right?

19 A Yes.

20 Q Up to 72 hours?

21 A That's what it states on number C.

22 Q Okay. I'm going to ask you about a
23 couple more of the 300 offenses.

24 306 is refusal to clean assigned living
25 area. Do you see that?

D I S C L O S U R E

STATE OF GEORGIA) DEPOSITION OF:

FULTON COUNTY) CALVIN BLUE

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Tanya L. Verhoven-Page,
Certified Court Reporter,
B-1790.

C E R T I F I C A T E

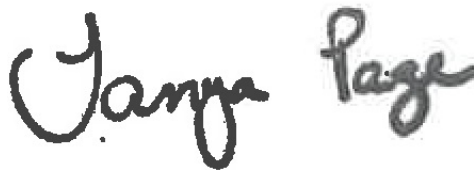
STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of kin or counsel to the parties in the case, am not in the regular employ of counsel for any of said parties, nor am I in any way financially interested in the result of said case.

Dated this 22nd day of November,
2021.



Tanya L. Verhoven-Page,
Certified Court Reporter,
B-1790.